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11 Attorneys for Defendant Cameron Collings

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13 **United States District Court**

14 **District of Nevada**

15 United States of America,

16 Plaintiff,

17 v.

18 Cameron Collings,

19 Defendant,

20 Case No. 2:19-cr-00311-JCM-DJA

21 Stipulation to Modify Conditions of Supervision  
(Second Request)

22 (Expedited treatment requested)<sup>1</sup>

23 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United  
24 States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the United States  
and Richard A. Wright Esq., of Wright Marsh & Levy, and Robert Draskovich Esq., of Draskovich  
25 Law Group, counsel for the Defendant, Cameron Collings, that the conditions of his pretrial release be

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28 <sup>1</sup> Due to the imminent travel dates requested, The Parties requests this Court review the  
Stipulation and proposed order expeditiously.

1 modified to allow for travel to the Central and Southern Districts of California, from September 1, 2020  
2 through September 20, 2020.

3 Neither the government nor United States Pretrial oppose this request.

4 This Stipulation is entered into for the following reasons:

5 1. The parties resolved this case preindictment. Thus, on January 2, 2020, a waiver of  
6 indictment, arraignment and change of plea hearing were held. ECF 5, 7. At that time, Mr. Collings  
7 pled guilty, by way of plea agreement, to one count receipt of child pornography in violation of 18  
8 U.S.C. §§ 2252A(a)(2)(A) and (B)(1). ECF 3, 5, 7. A personal recognizance bond (PR bond) was  
9 entered. ECF 9.

10 2. On June 26, 2020, Mr. Collings was sentenced to 87 months' imprisonment and the Court  
11 ordered a self-surrender date of October 23, 2020. ECF 25, 26. The Judgment of Conviction was  
12 entered on July 2, 2020. ECF 26.

13 3. Mr. Collings continues to remain under the supervision of United States Pretrial until he self-  
14 surrenders.

15 4. Mr. Collings has been on pretrial release since January 2, 2020 with no significant violations.

16 5. The parties and Pretrial Services recommend modifying his current pretrial conditions to the  
17 following:

- 18 • That Mr. Collings be allowed to travel from Las Vegas, Nevada to Huntington  
19 Beach, California on September 1, 2020 and stay at his mother's residence from  
September 1, 2020 through September 20, 2020.
- 20 • That during this time, Mr. Collings be able to travel throughout the Central and  
21 Southern Districts of California;
- 22 • That Mr. Collings provide his mother's contact information to Pretrial Services for  
23 verification that her residence is appropriate and suitable for his temporary stay;
- 24 • That Pretrial Services place Mr. Collings on GPS monitoring and curfew at the  
25 discretion of Pretrial Services during his travel dates of September 1, 2020 through  
26 September 20, 2020. In order to accommodate installation of the appropriate  
27 technology, that Mr. Collings shall report to Pretrial Services shortly before and  
28 shortly after his travel days to facilitate the GPS monitoring.

1           • That after the specified dates in this Order, Mr. Collings' normal curfew be re-  
2           imposed, and he be removed from GPS monitoring and be placed on RF  
3           monitoring.  
4           • All other conditions of Pretrial Supervision remain in effect as well as any other  
5           conditions previously imposed by this Court.

6           DATED August 25, 2020.  
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8           WRIGHT MARSH & LEVY

8           NICHOLAS A. TRUTANICH

9           United States Attorney

10          By: /s/ Richard A. Wright

11          Richard A. Wright  
12          Robert Draskovich  
13          Attorneys for Mr. Collings

14          By: /s/ Supriya Prasad

15          Supriya Prasad  
16          Assistant United States Attorney

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**United States District Court  
District of Nevada**

United States of America,

Plaintiff,

V.

Cameron Collings,

Defendant,

Case No. 2:19-cr-00311-JCM-DJA

Order Granting Modification of  
Pretrial Release Conditions

Pursuant to the Stipulation of the Parties and for good cause appearing:

IT IS HEREBY ORDERED: that the conditions of Defendant Collings' pretrial release be modified as follows:

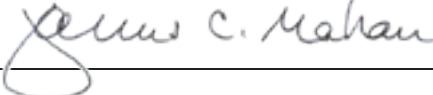
- That Mr. Collings be allowed to travel from Las Vegas, Nevada to Huntington Beach, California on September 1, 2020 and stay at his mother's residence from September 1, 2020 through September 20, 2020;
- That during this time, Mr. Collings be able to travel throughout the Central and Southern Districts of California;
- That Mr. Collings provide his mother's contact information to Pretrial Services for verification that her residence is appropriate and suitable for his temporary stay;
- That Pretrial Services place Mr. Collings on GPS monitoring and curfew at the discretion of Pretrial Services during Mr. Colling's dates of travel of September 1, 2020 through September 20, 2020. In order to accommodate installation of the appropriate technology, that Mr. Collings shall report to Pretrial Services shortly before and shortly after his travel days to facilitate the GPS monitoring.
- That after the specified dates in this Order, Mr. Collings' normal curfew be reimposed, and he be removed from GPS monitoring and be placed on RF monitoring.

1           • All other conditions of Pretrial Supervision remain in effect as well as any other  
2           conditions previously imposed by this Court.

3 IT IS SO ORDERED

4           September 4, 2020

5 DATE: \_\_\_\_\_

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8 UNITED STATES DISTRICT JUDGE

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